

**SEALED**

## UNITED STATES DISTRICT COURT

for the

District of Nebraska

**FILED**  
**US DISTRICT COURT**  
**DISTRICT OF NEBRASKA****MAR 19 2015****OFFICE OF THE CLERK**

United States of America

v.

Case No.

Issreal Sanchez-Espinoza, a/k/a Luis Guillermo  
Sanchez-Fraijo and Wendy Flores

8:15MJ68

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 17-18, 2015 in the county of Douglas in the  
District of Nebraska, the defendant(s) violated:*Code Section**Offense Description*

21:846

In the District of Nebraska and elsewhere, the defendants knowingly and intentionally combined, conspired, confederated and agreed together and with other persons ~~known and unknown to the Grand Jury~~ to commit the following offense(s) against the United States: to distribute and possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.  
*Complainant's signature*

DEA Special Agent Aaron Bowen

*Printed name and title*

Sworn to before me and signed in my presence.

Date:

3/19/15

City and state:

Omaha, Nebraska  
*Judge's signature*

F. A. GOSSETT, III, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

1. Your affiant, Aaron Bowen, is employed as a Special Agent of the U.S. Department of Justice Drug Enforcement Administration (DEA), and has been so employed since December 2005. Special Agent Bowen has successfully completed the DEA seventeen (17) week Basic Agent's course, which involves the identification of controlled substances, methods of their importation, transportation, manufacture, distribution, and concealment that are and have been utilized by controlled substance violators. During the employment of Special Agent Bowen, he has been involved in the investigation of numerous controlled substance violations, and has participated in the execution of search warrants and arrest warrants. As a result of his training, conversations with other agents, and experience, Special Agent Bowen has become familiar with the methods and techniques utilized by controlled substance violators to import, transport, manufacture, distribute, and conceal controlled substances.
2. This affidavit is made in support of an application for criminal complaint on Luis Guillermo SANCHEZ Fraijo and Wendy FLORES for violation of Title 21 USC 846, conspiracy to distribute methamphetamine. SANCHEZ is known to use date of birth of August 15, 1987. SANCHEZ was previously identified under this investigation as Issreal SANCHEZ-Espinoza and referred to utilizing that name. On March 18, 2015, SANCHEZ's proper name was discovered during the booking process. FLORES is known to use a date of birth of April 16, 1978.
3. On March 18, 2015, at approximately <sup>11:52 a.m. AB</sup>~~12:52 p.m.~~, surveillance at 4513 S 40th Street,

Omaha, Nebraska, observed SANCHEZ exit the residence and remove a silver Volkswagen Jetta from the detached garage at the residence and park in the driveway. Shortly thereafter, surveillance observed SANCHEZ exit the vehicle and enter the residence.

4. At approximately 11:56 <sup>a.m. PB</sup>~~p.m.~~, surveillance observed a 2011 Ford Escape, Arizona license plate AC71006, registered to Wendy FLORES, 5209 S 109th Avenue, Tolleson, Arizona pull directly into the driveway of 4513 South 40th Street and park inside the garage. At approximately 11:58 <sup>a.m. PB</sup>~~p.m.~~, surveillance observed a Hispanic female, subsequently identified as FLORES, exit the Escape and enter the residence.
5. At approximately 12:26 p.m., surveillance observed SANCHEZ and FLORES exit the residence. At approximately 12:27 p.m., surveillance observed SANCHEZ and FLORES enter the Jetta and depart.
6. At approximately 5:12 p.m., surveillance observed the Jetta arrive at 4513 South 40th Street and park in the driveway. Shortly thereafter, surveillance observed SANCHEZ and FLORES exit the Jetta and enter the residence. Flores was carrying a sack with newly-purchased clothing in it.
7. A federal search warrant was acquired for the residence. At approximately 6:04 p.m., the search warrant was executed at 4513 South 40th Street. Subsequently seized from the residence was approximately 2172 grams of field-tested-positive-methamphetamine, various drug packaging materials and apparent drug ledgers. A subsequent search of the Escape revealed an empty after-market compartment in the trunk area. SANCHEZ and FLORES were arrested and booked into Douglas County

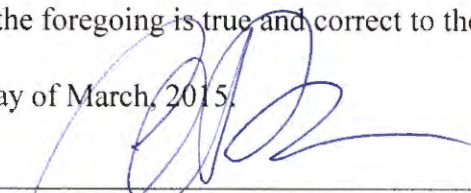


Jail.


8. Previous investigations by DEA and HSI in Omaha and Phoenix, Arizona had revealed that vehicles registered to FLORES were being utilized during the trafficking of narcotics from Phoenix to Omaha.
9. On May 2, 2013, HSI Omaha arrested a cooperating defendant and seized approximately 11 pounds of methamphetamine, 12 kilograms of cocaine, 4 kilograms of crack cocaine and \$500,000 from members of the Roberto TAPIA-Borjas drug trafficking organization. During a proffer interview, this defendant stated that Wendy FLORES lived in Phoenix, AZ, was a member of the Roberto TAPIA-Borjas drug trafficking organization ("DTO"), and was responsible for loading the narcotics into cars with non-factory compartments. The cooperating defendant stated that FLORES made at least one trip to Omaha with a load of narcotics in 2011.
10. The HSI investigation revealed the DTO had utilized three Toyota Camrys with the exact same non-factory compartment. At one point, Wendy FLORES was the registered owner of all three Camrys. Between 2011 and 2012, two of the Camry's were stopped while in route to Omaha. On both occasions law enforcement discovered approximately 10 kilograms of cocaine in the non-factory compartment. The third Camry was seized on May 2, 2013, following consent searches of an apartment garage used by the cooperating defendant mentioned above.
11. A driver of one of the Camrys agree to cooperate and identified FLORES from a photo line-up as the person he would meet in Phoenix to get the car loaded with narcotics.

12. In September, 2013, an HSI Omaha confidential informant loaded approximately \$35,000 of narcotics proceeds into a vehicle with a non-factory compartment used by the DTO to transport narcotics and narcotics proceeds to and from Omaha. HSI installed a court-ordered tracking device on that vehicle. It stopped at a residence in Phoenix associated with FLORES. HSI Phoenix seized the currency from Pablo TAPIA-Borjas, the younger brother of Roberto TAPIA-Borjas.
13. Further information from a HSI cooperating defendant revealed that from 2012 to 2013 he/she had made approximately ten trips to Phoenix, Arizona, transporting drug currency to Wendy FLORES. This person would receive methamphetamine and cocaine from Wendy FLORES and then return to Omaha, Nebraska.

I declare, under penalty and perjury, that the foregoing is true and correct to the best of my knowledge. Executed this day this \_\_\_\_ day of March, 2015.

  
\_\_\_\_\_  
Aaron Bowen, Special Agent  
Drug Enforcement Administration

Subscribed to and sworn to before me on 3/19/15.

  
\_\_\_\_\_  
F.A. Gossett, III  
U.S. Magistrate Judge

